

# Exhibit 1

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*Attorneys for Defendant Roblox Corporation*  
(\*Admitted Pro Hac Vice)

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RACHELLE COLVIN, individually and as  
next friend of minor Plaintiff, G.D.,  
DANIELLE SASS, individually and as next  
friend of minor plaintiff, L.C., DAVID L.  
GENTRY, individually and as next friend of  
minor plaintiff, L.G., OSMANY  
RODRIGUEZ, individually and as next friend  
of minor plaintiff, O.R., JOSHUA R.  
MUNSON, individually and as next friend of  
minor plaintiffs D.C., J.M., T.T., and R.T, and  
LAVINA GANN, individually and as next  
friend of minor plaintiff, S.J., and on behalf of  
all others similarly situated,

Plaintiffs,

v.

ROBLOX CORPORATION, SATOZUKI  
LIMITED B.V., STUDS ENTERTAINMENT  
LTD., and RBLXWILD ENTERTAINMENT  
LLC,

Defendants.

COOLEY LLP  
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Case No. 3:23-cv-04146-VC

**DECLARATION OF KYLE WONG IN  
SUPPORT OF THE PARTIES' JOINT  
STIPULATION CONCERNING THE  
DEADLINE TO COMPLETE PRIVATE  
MEDIATION**

Judge: Hon. Vince Chhabria

1 I, Kyle Wong, declare and state as follows pursuant to 28 U.S.C. § 1746:

2 1. I am an attorney with Cooley LLP, counsel for Defendant Roblox Corporation  
3 (“Roblox”). I submit this declaration in support of the parties’ Joint Stipulation and [Proposed]  
4 Order Adjourning Private Mediation Deadline Pursuant to Civil Local Rule 6-2. I make this  
5 declaration based on my personal knowledge and, if called as a witness, I could and would testify  
6 competently to the matters stated herein.

7 2. On April 18, 2024, as part of its case management procedure, the Court ordered the  
8 parties to complete private mediation by August 16, 2024 (Dkt. 78).

9 3. On May 14, 2024, Roblox Corporation filed a motion to dismiss Plaintiffs’  
10 Consolidated Class Action Complaint (Dkt. 87).

11 4. The parties have been participating in discovery and are proceeding toward initial  
12 and rebuttal class certification expert disclosure deadlines of October 31, 2024, and January 6,  
13 2025, respectively.

14 5. Roblox Corporation’s motion to dismiss the Plaintiffs’ Consolidated Class Action  
15 Complaint (Dkt. 87) remains pending.

16 6. The parties have not previously requested extension of the August 16, 2024 deadline  
17 to complete mediation.

18 7. Because of the nature and complexity of the issues of the case and the likelihood  
19 that both sides may present expert testimony, as well as the need for additional discovery, including  
20 depositions, the parties discussed the issue and agree that a delay in the mediation date would allow  
21 for a more efficient mediation. The parties believe that mediation would be more productive with  
22 the benefit of the Court’s ruling on Roblox Corporation’s motion to dismiss, as well as further  
23 discovery and expert disclosures pursuant to the Court’s case management order (Dkt. 78).

24 8. An extension of the private mediation deadline to February 7, 2025 would not  
25 impact any other deadline in this case (Dkt. 78).

26  
27 I declare under penalty of perjury under the laws of the United States that the foregoing is true and  
28 correct.

1 Dated: August 15, 2024

Respectfully submitted,

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3 By: /s/ Kyle Wong  
4 Kyle Wong

5 Attorney for Defendant  
6 ROBLOX CORPORATION  
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